

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

FEDERAL TRADE COMMISSION,
 Plaintiff,
 v.
 DIRECT MARKETING CONCEPTS, INC., et
 al.,
 Defendants.

CIVIL ACTION NO. 04-CV-11136GAO

**THE DMC DEFENDANTS' MOTION TO FILE
A MEMORANDUM IN EXCESS OF THE PAGE LIMIT**

Defendants Direct Marketing Concepts, Inc. (“DMC”), ITV Direct, Inc. (“ITV Direct”), and Donald W. Barrett (“Barrett”) (collectively “DMC Defendants”), respectfully request leave to file a Memorandum in Opposition to the FTC’s Motion for a Modification of the June 23, 2004 Preliminary Injunction that exceeds the page limit set forth in Local Rule 7.1(b)(4). The FTC filed a 32 page memorandum of law in support of its motion. Responding to that memorandum required the DMC Defendants to address a number of factual and legal issues raised by the FTC. In doing so, the DMC Defendants’ memorandum of law exceeds the page limit of the Local Rule, but is still of shorter length than the memorandum filed by the FTC.

WHEREFORE, the DMC Defendants request leave to file a memorandum of law in excess of twenty (20) pages.

Respectfully submitted,
DIRECT MARKETING CONCEPTS, INC., ITV
DIRECT, INC., AND DONALD W. BARRETT

By their attorney(s),

/s/ Christopher Robertson

Peter S. Brooks, BBO #058980

Christopher F. Robertson, BBO #642094

Susan W. Gelwick, BBO #567115

SEYFARTH SHAW LLP

Two Seaport Lane, Suite 300

Boston, MA 02210-2028

Telephone: (617) 946-4800

Telecopier: (617) 946-4801

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